

Flores, Priscilla (Feliciano)

From: Davidj Gray <gray.davidj@epamail.epa.gov>
Sent: Tuesday, August 19, 2014 2:29 PM
To: Gray, Davidj
Subject: International Salt
Attachments: Triton-ISCO Charlestown NPR.doc; ATTXLXTZ.doc

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David J. Gray, P.E.  
Office of Ecosystem Protection  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Ste. 100 (OEP06-1)  
Boston, MA 02109-3912

Phone: 617.918.1577  
eFax: 617.918.0577  
gray.davidj@epa.gov

----- Forwarded by Davidj Gray/R1/USEPA/US on 08/19/2014 02:28 PM -----

From: Davidj Gray/R1/USEPA/US  
To: David Webster/R1/USEPA/US@EPA  
Date: 07/29/2010 07:24 AM  
Subject: International Salt NPR

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Hi Dave,

Attached is a draft letter responding to a permitting determination letter request from International Salt. It's a pretty straightforward response, but I just wanted to check two things:

- 1) Do you want to be the signatory (the letter came directly to me)?
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n.b. ISCO has also submitted an identical request letter for its Portsmouth, NH facility for which I'll prepare a similar response

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The Autoport (who is actually a tenant of MassPort) has overall site coverage under its 2008 MSGP. Also, though Triton states in its letter that the Port of Portsmouth has overall site coverage under the MSGP - our database shows no such coverage for the port. I believe Triton is assuming this to be the case or maybe they are confusing it with the City of Portsmouth's MS4 Permit. With respect to site controls - Triton has described that BMPs are employed at both ISCO facilities, but also admits there is potential that stormwater discharged from the sites could come in contact with the salt piles.

Operators authorized under the 2008 MSGP have the obligation to identify locations of on-site salt piles, and enclose or cover salt piles and implement measures to minimize exposure during loading/unloading operations. In addition, EPA considers as regulated stormwater run-on that commingles with stormwater discharges associated with the operator's industrial activities; requiring operator's to identify locations and sources of run-on from adjacent property that contains significant quantities of pollutants. Therefore, the implication is that an operator is responsible for tenant or off-site activities that are not otherwise covered by their own NPDES permit. In the case of the Charlestown facility, the Boston Autoport should comply by incorporating the above in its SWPPP and including some type of compliance clause with ISCO in its sublease. With respect to Portsmouth - I'll first need to do some more research to learn if the port has (or should have) MSGP coverage.

As far as us copying the site operators, I think that is something ISCO should and would likely do on its own; however, I can copy Autoport, Massport, and the Port of Portsmouth accordingly.

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To: Davidj Gray/R1/USEPA/US@EPA  
From: David Webster/R1/USEPA/US  
Date: 07/29/2010 10:33AM  
Subject: Re: International Salt NPR

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From: David Webster/R1/USEPA/US  
To: Davidj Gray/R1/USEPA/US@EPA  
Date: 07/30/2010 08:54 AM  
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Let's try to discuss today.

1. ways to ensure the Autoport SWPPP contains the BMP provisions you describe
  2. coordination with and/or deferral to the Mystic Initiative and/or enforcement
- DW

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